

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

JUL 8 2019

MITCHELL R. ELFERS
CLERK

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiffs,

vs.

CR No.19-MJ-1159-SCY

CHRISTOPHER DOUGLAS,

Defendant.

WAIVER AND CONTINUANCE OF GRAND JURY PRESENTMENT

1. I am the defendant in this criminal proceeding.
2. I understand that I am entitled to a preliminary hearing, but I have agreed to waive my right to that hearing in exchange for the following:

- ☐ Pre-Indictment discovery
- ☒ Pre-Indictment plea negotiations
- ☒ Mental Competency Examination
- ☐ _____

3. I understand that I have a right to have my case presented to a grand jury within thirty (30) days of my arrest pursuant to 18 U.S.C. § 3161(b).

4. I hereby request a continuance of grand jury presentment for an additional period not to exceed 120 days from the date of the Court's Order for Mental Competency Examination Pursuant to 18 U.S.C. § 4241 (Doc. 16), such delay shall be excludable in computing the time within which an Information or an Indictment must be filed. 18 U.S.C. §3161(h)(1)(A). I further request that an Order be entered providing that the period shall

be excluded from speedy indictment time computation pursuant to 18 U.S.C. § 3161(h)(7)(A).

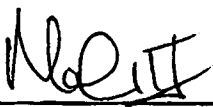
5. Continuing the grand jury presentment will allow me to be examined for mental competency and my attorney to attempt to negotiate a pre-indictment plea agreement with the government, whose terms may be more acceptable to me than those of an agreement offered after indictment.

6. If I cannot reach an agreement with the United States Attorney's Office, I understand that my case will be presented to a grand jury at a later date, consistent with this waiver.



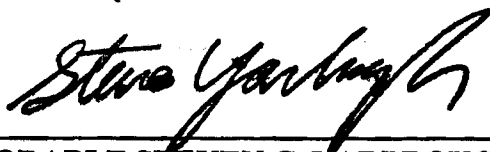
Christopher Douglas, Defendant

I have reviewed the foregoing waiver with my client, Christopher Douglas, and represent to the court that he understands it. I further represent to the court that I believe it is in my client's best interest to agree to this waiver.



Martin Lopez, III
Attorney for Defendant

DATE: July 5, 2019



HONORABLE STEVEN C. YARBROUGH
UNITED STATES MAGISTRATE